

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

TAL PRIHAR,

Defendant.

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Criminal No. 19-115-DWA
ELECTRONICALLY FILED

CONSENT MOTION TO CONTINUE SENTENCING HEARING AND DEADLINES

Defendant, Tal Prihar (“Defendant”), by and through undersigned counsel, hereby files this Consent Motion for Continuance of Sentencing Hearing and Deadlines, stating as follows:

1. On March 31, 2021, Defendant pleaded guilty to Count 1 of the Indictment at Criminal No. 19-115-1 in this matter. (ECF Doc. 47.)

2. Defendant’s Sentencing Hearing is currently scheduled for December 2, 2021, at 11:30 AM.

3. Sentencing memoranda, motions for upward/downward departures, and a joint status report are due in advance of the Sentencing Hearing.

4. Undersigned counsel and counsel for the United States continue to prepare sentencing filings and matters for the sentencing hearing. Given the nature and complexities of the case, that preparation has involved voluminous data, international materials and unique issues of international law. Counsel requests additional time to complete such preparations, finalize pre-sentence filings, and conduct final preparations for the hearing.

5. Counsel does not expect to need to request any further continuances of any sentencing dates.

6. For these reasons, Defendant respectfully requests a continuance of the Sentencing Hearing and associated deadlines of fifty (50) days from the currently scheduled Sentencing Hearing date, or until on or after January 20, 2021.

7. To the extent scheduling is a factor, undersigned counsel contemplates filing a motion to request the hearing be held by video conference.

8. AUSA Smolar and DOJ Trial Attorney Pelker consent to this request.

WHEREFORE, the Defendant respectfully requests that this Honorable Court grant this Motion and continue the sentencing deadlines as requested.

Dated: November 22, 2021

Respectfully Submitted,

/s/ Michael A. Comber

Michael A. Comber

PA ID No. 81951

Reisinger Comber & Miller, LLC

436 Seventh Avenue

Pittsburgh, PA 15219-1827

(412) 894-1380

mcomber@reisingercomber.com

cc: All ECF Registered Counsel of Record